

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

ANGELA ENGLE HORNE)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.: 3:16cv92
)	
WTVR, LLC d/b/a CBS6)	
)	
Defendant.)	

PLAINTIFF'S EXHIBIT LIST

Plaintiff Angela Engle Horne, by counsel, pursuant to paragraph 5 of the Amended Pre-trial Order entered in this case on January 10, 2017, hereby discloses the following exhibits she expects to offer in the trial of this matter:

1. Video of WTVR's news story entitled "Sources: Convicted felon worked at school board office in Central Va." which aired on Feb. 13, 2015 (the "News Story").
2. Transcript of the News Story produced by WTVR (Exhibit 4 to the deposition of Wayne Covil).
3. Website version of the News Story, found at <http://wtvr.com/2015/02/13/sources-convicted-felon-worked-at-school-board-office-in-central-va/>. (also found at Exhibit 2 to the deposition of Wayne Covil)
4. February 13, 2015 e-mail, sent at 12:33 p.m., from Mike Bergazzi to "ALL WTVR Producers" and Wayne Covil, subject line: "angela horne screen shot"; and screen shot attachment to e-mail (found at the first two pages of Exhibit 1 to the deposition of Wayne Covil).
5. February 13, 2015 e-mail chain, beginning with e-mail sent at 1:00 p.m. from Mike Bergazzi to "ALL WTVR Producers" and Wayne Covil, subject line: "re: angela horne screen shot" (found at page 4 of Exhibit 1 to the deposition of Wayne Covil)
6. February 13, 2015 e-mail, sent at 1:29 p.m., from Mike Bergazzi to Wayne Covil and Misti Davidson, subject line: "i am almost positive this is her . . ." (found at page 3 of Exhibit 1 to the deposition of Wayne Covil)

7. February 13, 2015 e-mail chain that includes February 13, 2015 anonymous e-mail sent to Wayne Covil at 11:48:03 a.m. (Exhibit C to Plaintiff's Memorandum in Opposition to WTVR's Motion for Summary Judgment).
8. Exhibit 3 to the deposition of Wayne Covil.
9. WTVR's Answers to Plaintiff's First Set of Interrogatories.
10. WTVR's Answer to Plaintiff's Complaint.
11. Virginia School Law Deskbook (2006 Ed.).
12. Exhibit 5 to WTVR's 30(b)(6) deposition, Vol. II (Ooyala information produced by WTVR) (also found at Exhibit J to Plaintiff's Opposition to WTVR's Motion for Summary Judgment).
13. Plaintiff's application for employment to the Prince George County Public Schools.
14. Minutes from January 12, 2015 meeting of the Prince George County School Board.
15. Minutes from the January 29, 2015 meeting of the Prince George County School Board.
16. Minutes from the February 10, 2015 meeting of the Prince George County School Board.
17. Plaintiff's pharmacy records from Walnut Hill Pharmacy, Inc. for the period from 01/01/15 through October 14, 2016.
18. Any non-objectionable exhibits identified by Defendant.
19. Any exhibits necessary for rebuttal.

Respectfully submitted,

ANGELA ENGLE HORNE

By: s/ Richard F. Hawkins, III
Virginia Bar Number: 40666
THE HAWKINS LAW FIRM, PC
2222 Monument Avenue
Richmond, Virginia 23220
(804) 308-3040 (telephone)

(804) 308-3132 (facsimile)

Email: rhawkins@thehawkinslawfirm.net

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of March 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF systems which will send notification of such filing to the following:

Conrad M. Shumadine
Brett A. Spain
Willcox & Savage, P.C.
440 Monticello Avenue, Suite 2200
Norfolk, Virginia 23510
(757) 628-5525 (direct dial)
(757) 628-5566 (facsimile)
cshumadine@wilsav.com

s/ Richard F. Hawkins, III
Virginia Bar Number: 40666
THE HAWKINS LAW FIRM, PC
2222 Monument Avenue
Richmond, Virginia 23220
(804) 308-3040 (telephone)
(804) 308-3132 (facsimile)
Email: rhawkins@thehawkinslawfirm.net

Counsel for Plaintiffs